

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

FEDERAL TRADE COMMISSION, :
Plaintiff, :
v. :
KEVIN TRUDEAU, :
Defendant. :
: Civil Action No. 03-C-3904

**MOTION TO HOLD DEFENDANT TRUDEAU IN CONTEMPT FOR VIOLATING THE
JUNE 2, 2010 ORDER, INCARCERATE HIM, AND ORDER HIM TO PROVIDE AN
ACCOUNTING OF AND TURNOVER ASSETS**

On June 2, 2010, the Court ordered Defendant Kevin Trudeau to pay a contempt sanction of \$37,616,161 to the FTC. Trudeau has violated the Court's Order by failing to pay even one penny, and his claim of poverty is meritless. He is engaged in multiple lucrative business ventures that generate millions of dollars in revenues. He has systematically concealed substantial assets by various means, and dissipated other assets on his lavish lifestyle. Moreover, Trudeau's complete failure to pay, his extensive history of failing to obey court orders, and his total lack of credibility, demonstrate that he will not comply with the Court's Order unless he is coerced to do so by incarceration. Accordingly, the FTC moves to: (1) hold Trudeau in contempt for failing to pay the \$37,616,161 contempt sanction; (2) immediately incarcerate him to coerce his compliance; and (3) order that he remain incarcerated until he purges his contempt by paying the sanction in full, with interest, and failing that, until he fully accounts for and turns

over all assets directly or indirectly held by him or for his benefit. This Motion is supported by the FTC's accompanying Brief and Exhibits in support thereof.

Dated: July 13, 2012

Respectfully submitted,

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